

ATTACHMENT C

**COMMENTS AND COUNTERPROPOSAL
OF RADIO ONE LICENSES, INC., DATED OCTOBER 22,2001**

STAMP & RETURN

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

OCT 22 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

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Amendment of Section 73.202(b),
FM Table of Allotments
FM Broadcast *Stations*
(Valliant, Oklahoma)

MM Docket No. 01-216
RM- 10223

To: Chief. Allocations Branch
Policy and Rules Division
Mass Media Bureau

COMMENTS AND COUNTERPROPOSAL

Radio One Licenses, Inc. ("ROL"), by its counsel and pursuant to Sections 1.420(a) and 1.420(d) of the Commission's Rules, hereby submits its comments and counterproposal related to the *Notice of Proposed Rule Making* ("NPRM") in the above-captioned proceeding. *See Broken Bow, Oklahoma, et al.*, DA 01-2058, released August 31, 2001. In support hereof, ROL respectfully states as follows.

1. By Petition for Rule Making dated July 10, 2001, and date stamped as having been received in the FCC Mail Room on July 16, 2001, Maurice Salsa ("Salsa") requested *that* the Commission allot Channel 234C3 to Valliant, Oklahoma, as that community's first aural broadcast transmission service. On August 22, 2001, the Commission, by its Chief, Allocations Branch, adopted the multiple-docket *NPRM*, which set forth various separate proposals to mend

the FM Table of Allotments. Among those proposals was Salsa's proposal to allot Channel 234C3 to Valliant. *NPRM* at p. 7.

z. On August 30, 2001, after the August 22 adoption date of the *NPRM* but before the *NPRM* was released on **August 31**, 2001. ROL filed a minor change application to modify the facilities of Station KTXQ-FM operating on Channel 233C at Gainesville, Texas. *See* File No. BPH-20010830ABN, as amended on September 10, 2001 (the "*KTXQ Application*"). The *KTXQ Application* (both as originally filed and as mended) conflicts with *the* Salsa proposal to allot Channel 234C3 to Valliant. The Commission adopted procedures to address such conflicts in *Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments*, 7 FCC Rcd 4917 (1992), *recon. granted in part and denied in part*, 8 FCC Rcd 4743 (1993). Pursuant to those procedures, where a rulemaking petition is filed prior to a conflicting FM application and the FM application is filed before the deadline for counterproposals in the rulemaking proceeding, the petition and the application will both be considered timely filed and treated under the Commission's policy for resolving conflicts between applications and rulemaking petitions. 7 FCC Rcd at 4919 n.18. As a result, ROL's *KTXQ Application* is eligible for consideration in the above-captioned proceeding. *See, e.g., Chehalis, Washington*, 13 FCC Rcd 20262, 20263 (M.M.Bur. 1998); *Banks, Redmond, Sunriver and Corvallis, Oregon*, 13 FCC Rcd 6596, 6597 (M.M.Bur. 1998), *recon. denied* 16 FCC Rcd 2272 (M.M.Bur. 2001).

3. Where *the* Commission is presented with a conflict between a proposed allotment and a pending FM modification application, it is the Commission's policy to accommodate both proposals where possible. Thus, in *Conflicts Between Applications and Petitions for Rulemaking to Amend the FM Table of Allotments*, *supra*, the Commission provided that: "First, we try to restrict the site of the proposed allotment or to use an alternative channel to eliminate the

conflict.” 7 FCC Rcd at 4917; *see also Ocean Shores, Washington*, 13 FCC Rcd 2833, 2834 n.2 (M.M.Bur. 1998) (“since the application was filed after the instant petition for rule making, the application has to be considered ... in the context of this proceeding unless the conflict can be eliminated by the use of a site restriction...”); *Weaverville, California*, 12 FCC Rcd 2965 (M.M.Bur. 1997), *Durango and Dolores, Colorado*, 12 FCC Rcd 9740 (M.M.Bur. 1997), and *Kerman, California*, 12 FCC Rcd 2965 (M.M.Bur. 1997) (alternative channels used to eliminate conflicts between rulemaking proposals and pending modification applications); *Huntingdon, Tennessee*, 8 FCC Rcd 3918 (M.M.Bur. 1993) (site restriction used to eliminate conflict between proposed new allotment and station upgrade proposal).

4. In *the* instant proceeding, the proposed Valliant allotment and the *KTXQ Application* can both be accommodated through the use of a site restriction for the proposed allotment. As demonstrated in the attached *Engineering Exhibit EE-RM* prepared by Mullaney Engineering, Inc. (the “*Engineering Exhibit*”), the *KTXQ Application* is short spaced to the reference point of the proposed Valliant allotment by 7 kilometers. By adopting a 7.3-kilometer North-Northeast site restriction for Channel 234C3 at Valliant, the Commission would eliminate the conflict between the proposed allotment and the *KTXQ Modification*. Such an action would advance the public interest by permitting a prompt resolution of the above-captioned proceeding, permitting the establishment of a new first local transmission service, and permitting the improvement of KTXQ-FM’s existing service by enabling KTXQ-FM to relocate to a taller tower currently under construction. *See* ASR No. 1227538.

5. The proposed Channel 234C3 site restriction for Valliant is fully consistent with the reference point for Valliant (34 00 35 N, 95 00 22 W) that Salsa requested in his Petition for Rule Making. *See Engineering Exhibit*. Indeed, Salsa’s proposed reference point is further from

Valliant than that proposed by ROL herein. Accordingly, Salsa should have no objection to ROL's proposed site restriction. Also, as indicated in the *Engineering Exhibit*, the proposed alternate Channel 234C3 site restriction will provide an unobstructed view of the community of license, is located close enough to Valliant to permit the required 3.16 mV/m (70 dBu) coverage of the entire community, has a site window encompassing over 350 square kilometers, and should not present any FAA concerns. The 7.3-kilometer site restriction is well within the Commission's assumption, at the allotment stage, that a Class C3 station can provide principal community coverage to its community of license if its transmitter is situated no more than 23 kilometers from the center of the community. See *Engineering Statement*.

6. Only in the event that the Commission finds it cannot accommodate the Valliant Class 234C3 proposal and the *KTXQ Modification Application* by placing a site restriction on the proposed allotment, ROL requests that the Commission allot Channel 234A to Valliant in lieu of the proposed Channel 234C3. Should the Commission allot Channel 234A to Valliant, ROL hereby states its expression of interest in filing an application for the Channel 234A Valliant allotment.

7. The public interest would be served by allotting Valliant a Class A frequency because such an allotment would provide Valliant with a first local transmission service that would cover *the* entire community of license and beyond without precluding Station KTXQ-FM from improving its own coverage by moving to a taller tower. Given that the 2000 Census shows Valliant's population as only 771 persons, and that the population has declined by 11.7% between the 1990 Census and the 2000 Census (*see Engineering Exhibit EE-RM*), a Class A station would be more than adequate to meet the community's local transmission needs, Allotting a *Class A* frequency to Valliant in lieu of a Class C3 frequency would permit the

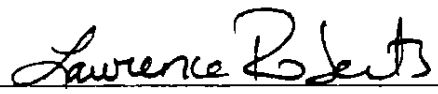
improvement of KTXQ-FM's existing service by a relocation to a taller tower now under construction with a power of 78 kilowatts ERP as compared to the 63 kilowatts maximum ERP that KTXQ-FM could achieve at the taller tower were the Commission to allot an unrestricted Class 234C3 channel at Valliant.

8. In conclusion, ROL requests that the Commission accept the *KTXQ Application* as timely-filed in the above-captioned proceeding and either (1) allot Channel 234C3 to Valliant with a site restriction of 7.3 kilometers to the East-Northeast to eliminate a conflict with the *KTXQ Application*; or (2) allot Channel 234A to Valliant in lieu of Channel 234C3, which would also eliminate the conflict. In either event, ROL requests that the Commission act expeditiously to grant the *KTXQ Application* so that ROL can provide improved service to the public on Station KTXQ-FM

WHEREFORE, Radio One Licenses, Inc., respectfully requests that the Commission ADOPT expeditiously a Report and Order consistent with these Comments and Counterproposal and GRANT expeditiously the *KTXQ Application*

Respectfully submitted,

RADIO ONE LICENSES, INC.

By: 
Lawrence Roberts
Holly Rachel Smith

DAVIS WRIGHT TREMAINE LLP
1500 K Street, N.W, Suite 450
Washington, DC 20005
202-508-6603

Its Attorneys

October 22, 2001

MULLANEY ENGINEERING, INC.

9049 SHADY GROVE COURT
GAITHERSBURG, MD 20877

ENGINEERING EXHIBIT EE-RM:

**COMMENTS AND COUNTERPROPOSAL
RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**MM DOCKET 01-216 - VALLIANT, OKLAHOMA
ALTERNATE SITE REQUEST**

OCTOBER 22, 2001

**ENGINEERING STATEMENT PREPARED ON BEHALF OF
RADJO ONE LICENSES. INC.
LICENSEE OF KTXQ-FM
CHANNEL 233C - GAINESVILLE, TEXAS**

ENGINEERING EXHIBIT EE-RM:

**COMMENTS AND COUNTERPROPOSAL
RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**MM DOCKET 01-216 - VALLIANT, OKLAHOMA
ALTERNATE SITE REQUEST**

TABLE OF CONTENTS:

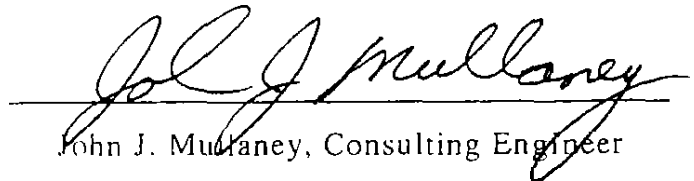
1. Declaration of Engineer
2. Figure 1, Channel Allocation Study for Ch. 234C3.
From Alternate Ref. Point for Valliant, OK
3. Figure 2, Allowable Area Map - Ch. 234C3
4. Figure 3, Channel Allocation Study for Ch. 234A.
From City Ref. Point for Valliant, OK

Declaration

I, John J. Mullaney, declare and state that I am a graduate electrical engineer with a B.E.E. and my qualifications are known to the Federal Communications Commission, and that I am an principal engineer in the firm of Mullaney Engineering, Inc., and that I have provided engineering services in the area of telecommunications since 1977. My qualifications as an expert in radio engineering are a matter of record with the Federal Communications Commission.

The firm of Mullaney Engineering, Inc., has been requested by Radio One Licenses. Inc., to prepare the instant engineering exhibit in support of its Comments and Counterproposal to amend the FM Table of Allotments in MM Docket 01-216.

All facts contained herein are true of my own knowledge except where stated to be on information or belief, and as to those facts, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.



John J. Mullaney, Consulting Engineer

Executed on the 22nd day of October 2001

ENGINEERING EXHIBIT EE-RM:

**COMMENTS AND COUNTERPROPOSAL
RULE MAKING TO AMEND
FM TABLE OF ALLOTMENTS**

**MM DOCKET 01-216 - VALLIANT, OKLAHOMA
ALTERNATE SITE REQUEST**

NARRATIVE STATEMENT:

This engineering statement has been prepared on behalf of Radio One Licenses, Inc., licensee of Radio Station KTXQ-FM, at Gainesville, Texas. KTXQ-FM has a pending application which is short spaced to a proposal to allot FM Channel 234C3 to Valliant, Oklahoma (MM Docket 01-216). The purpose of this statement is to provide engineering in support of its Comments and Counterproposal proposing to (1) site restrict the reference point for Ch. 234C3 by 7.3 km to the East-Northeast or (2) allot Ch. 234A in lieu of 234C3

Adoption of this counterproposal will still permit Valliant to receive a first service (Class C3 or A) and will permit Radio One to operate KTXQ-FM from a tall tower bite.

Counterproposal

Allotment of Site Restricted FM Channel

Figure 1 is a Channel Allocation Study on **234C3** from an alternate reference point which is 7.3 **km** East-Northeast of the city of Valliant, OK. From this study it can be determined that proposed reference point exceeds all of these minimum separations.

The proposed alternate **C3** coordinates are:

N. Latitude: 34" 01' 10" NAD-27

W. Longitude: 95" 01' 10"

The proposed separation to the KTXQ-FM 233C pending application is 176.2 km. The required separation from 234C3 is 176 km and thus, no short spacing results.

The proposed alternate C3 reference site will provide an unobstructed view of the city of license, Valliant, OK and is located close enough to serve the entire community with the required 3.16 mV/M or 70 dBu contour. Since a C3 facility has a reference city grade of 23 **km** it is possible to still place a 70 dBu some 15 km past the boundaries of Valliant, OK.

It has been determined that there are no airports within a radius of 18 km (11.2 miles) of the alternate reference point proposed

herein. Thus, FAA protection requirements should not be a material factor in the selection of a tower site for Valliant.

The original rule making provided the following suggested coordinates: 34-00-35 / 95-00-22. The NPRM proposed the coordinates of the city reference point, which are 8.3 km west of the proponent's suggested site. The alternate reference point proposed herein is just 1.6 km northwest of the proponent's suggested site. Considering the fact that the alternate reference point is closer to Valliant than the site suggested by the proponent (and closer to the proponent's suggested site than the original NPRM reference point) the proponent should have no objection to this modification.

Figure 2 is a map which illustrates the required separations for a facility operating on Ch. 234C3 at Valliant, OK. The "green" line represents the additional restriction imposed by KTXQ's pending application. As can be seen, there is more than sufficient area (over 350 square kilometers) in which an applicant at Valliant can propose to locate its tower and still serve Valliant.

Allotment of Class A in lieu of Class C3 FM Channel

Figure 3 is a Channel Allocation Study on **234A** from the city reference point (as specified in the NPRM for 234C3) for Valliant, OK. The study indicates the actual and required separation in kilometers to all licenses, construction permits, applications, vacant allocations and pending rule makings. From this study it can be determined that proposed Class A reference point exceeds all of these minimum separations, including the subsequently filed application of KTXQ-FM.

As specified in the pending docket the city reference coordinates for Valliant, OK, are:

N. Latitude: 34" 00' 06" NAD-27
W. Longitude: 95° 05' 42"

The proposed separation from the Valliant reference point proposed in the NPRM to the pending application of KTXQ-FM is 169.0km. The required separation between a Ch. 234C3 & a 233C is 176 km and thus, the KTXQ-FM application site is short spaced by 7 km. However, if Valliant is downgraded to Ch. 234A the required separation is only 165 km and, thus, no short spacing results between the NPRM coordinates and KTXQ-FM's pending application.

Public Interest Showing

KTXQ-FM's pending proposal to change sites is short spaced by 7 km to the Valliant C3 reference point as currently proposed in MM Docket 01-216. That short spacing would require KTXQ-FM to reduce its ERP to 63 kW in order to avoid a prohibited overlap. Adoption of the alternate reference point proposed herein would eliminate the need for KTXQ-FM to reduce its ERP in order to protect Valliant. It should be noted that the 7.3 km site restriction proposed herein is totally consistent with past allotment decisions. Had KTXQ-FM filed prior to the filing of the initial rule making petition for Valliant, the FCC staff

would have on its own motion site restricted Ch. 234C3 since city grade service from a C3 facility from a site 7.3 km away would still easily be provided to Valliant. No alternate properly spaced Class C channel exists for use by KTXQ-FM nor does any alternate Class C3 or A channel exist for use at Valliant which is not more short spaced from the city reference point.

Use of a site restriction on Ch. 234C3 is a viable alternative which will permit both the Valliant RM and the KTXQ-FM pending application to be granted. Alternately, the FCC staff could elect to allocate Ch. **234A** to Valliant since it requires no such site restriction to protect the pending application of KTXQ-FM.

The city of Valliant, OK, is located in McCurtain County. According to the 1990 Census the city has a population of 873 persons. However, according to the 2000 Census the population of Valliant has declined *to* 771 persons (1 1.7% reduction in population).


Based upon the above information. KTXQ-FM believes that its request results in a preferential arrangement of allotments and therefore, serves the public interest.

SUMMARY

Radio One Licenses, Inc., licensee of Radio Station KTXQ-FM, at Gainesville, Texas herein files its Comments and Counterproposal in MM Docket 01-216. Radio One requests to modify the pending proposal at Valliant, Oklahoma. to (1) site restrict the reference point for Ch. 234C3 by 7.3 km to the East-Northeast of the city or (2) allot Ch. 234A in lieu of 234C3 if the site restriction is not adopted.

	Proposed in NPRM	Proposal of Radio One Licenses
Valliant, OK	234C3	234C3 # or 234A
		# site restricted

Radio One believes that modification of the NPRM as proposed herein will serve the public interest by allotting a channel to Valliant and by permitting a grant of the KTXQ-FM change of site application. If the Class A channel is allotted as requested herein. Radio One will file a Form I75 for the Valliant FM facility at the appropriate time.


John J. Mullaney, Consulting Engineer

October 22, 2001.

***** FM CHANNEL STUDY NO. 1 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 15-OCT-03 10:03:24 *****
 ***** LAST UPDATE: 011015 *****

ALT	234 C3	FR	POLARIZATION	ERP (KW)	HAAT	RCAMSL
VALLIANT OK	US			HOR PLN	BM TILT	(METER)
34.0110	95.0110 (D.MMSS)	94.7 MHz	HORIZONTAL	25.000	0.000	100.0
			VERTICAL	25.000	0.000	100.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 25.000 (XW) 14.0 (DBK) HAAT= 100.0 (METERS)

CALCULATED HAAT FROM TOPO DATA BASE

INTERFERING	DOMESTIC
	DBU KM
CO CHANNEL (40.0)	113.6
1ST ADJACENT (54.0)	60.2
2ND ADJACENT (80.0)	12.9
3RD ADJACENT (100.0)	4.1
PROTECTED (60.0)	39.1
CITY GRADE (70.0)	23.2

AZIMUTH	HAAT	HAAT	CONTOURS (KM)	
DEGREES	(METERS)	(FEET)	70 DBU	60 DBU
0.0	90.1	295.5	22.1	37.3
45.0	94.5	310.0	22.6	38.1
90.0	117.9	386.9	25.1	41.8
135.0	97.3	319.1	22.9	38.6
180.0	109.4	359.0	24.2	40.6
225.0	106.8	350.1	24.0	40.2
270.0	86.7	284.3	21.7	36.7
315.0	97.4	319.5	22.9	38.6
AVERAGE	100.0	328.1	23.2	39.1

EST SITE ELEVATION :	120.6 m.;	395.6 ft.
EST RAD CENTER AGL :	117.9 m.;	386.9 ft.
RAD CENTER A.M.S.L.:	238.5 m.;	782.5 ft.

ALTERNATE PROPOSAL - SITE RESTRICTED CLASS C3 ALLOTMENT

CHANNEL ALLOCATION - CH. 234C3
 (Site Restricted)

MM DOC 01-216 - VALLIANT, OK
 COUNTERPROPOSAL - RADIO ONE LICENSES, INC.

MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND

FIGURE 1 (page 1 of 2)
 October 2001

**ALTERNATE PROPOSAL - SITE RESTRICTED CLASS C3 ALLOTMENT
DOWNGRADED TO CLASS A ALLOTMENT USING CITY REFERENCE POINT**

AZIMUTH		CALI	STS	FILE NUMBER	CITY	ST C	LAT (D.MMSS)	LONG	REL CHN	ERP (KW)		HAAT D (M)	I-CON €5010	P-CON €5050	IR DIST RSEP (KM)	IC RSEP IR (KM)	RI RSEP IR (KM)
FROM	TO									HORZ	VERT						
334.3	154.1		ADD	RM10211	CLAYTON	OK A	34.3522	95.2109	2ND 232C3	H	V				70.3	43.	
145.8	326.4	KRUF	LIC	BLH880314KB	SHREVEPOR	LA A	32.4013	93.5559	1ST 233C	100B	100B	334			100.6	176.	C
254.2	73.6	KTXQ-F	LIC	BLH001031AC	GAINESVIL	TX A	33.3337	96.5734	1ST 2335	100H	100V	581			186.7	176.	
252.7	71.7	KTXQ-F	APP	BPH010830AB	GAINESVIL	TX A	33.3209	96.4954	1ST 233C	78B	78B	5910			176.2	176.	C
34.2	214.8	KOLX	LIC	BLH930211KE	BARLING	AR A	35.1303	94.0108	1ST 233C2	31H	31V	1530			161.5	117.	
254.2	74.1		ADD	RM10223	VALLIANT	OK A	34.0006	95.0542	CO 234C3	H	V				1.3	153.	5
308.6	127.2	KQSR	LIC	BLH000105AA	OKLAHOMA	OK A	35.3552	97.2922	CO 234C	94.9H	94.9V	3720			285.9	237.	
229.3	48.2	KLTY	LIC	BLH910506KF	ARLINGTON	TX A	32.3522	96.5810	1ST 235C	100B	100B	460			241.1	176.	
229.2	48.2	KLTY	CP	BPH010613AC	ARLINGTON	TX A	32.3519	96.5805	1ST 235C	99H	99V	508			241.1	176.	
78.9	260.5	KOLL	LIC	BLH920326KC	MAUMELLE	AR A	34.2631	92.1303	1ST 235C	100B	100B	562			262.4	176.	
139.2	319.6	KEWL-F	LIC	BLH950714KA	NEW BOSTO	TX A	33.2615	94.2511	2ND 236C3	25H	25V	99			85.2	43.	
134.8	315.2	KEWL-F	CP	BPH971104IE	NEW BOSTO	TX A	33.3042	94.2431	2ND 236C2	22H	22V	1440			79.8	56.	

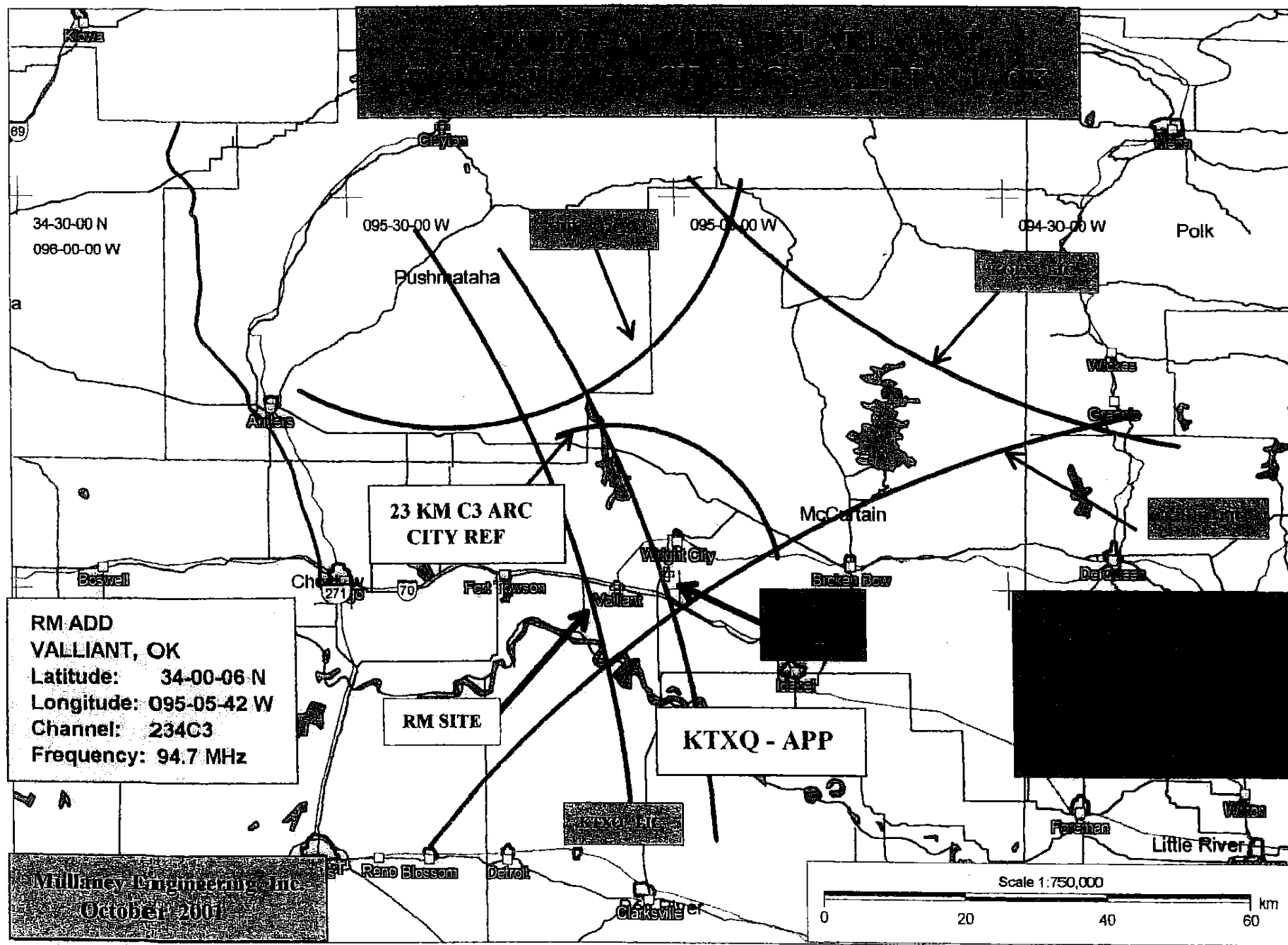
THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CHANNEL ALLOCATION - CH. 234C3
(Site Restricted)

MM DOC 01-216 - VALLIANT, OK
COUNTERPROPOSAL - RADIO ONE LICENSES, INC.

MULLANEY ENGINEERING, INC.
GAITHERSBURG, MARYLAND

FIGURE 1 (page 2 of 2)
October 2001



***** FM CHANNEL STUDY NO. 2 - MULLANEY ENGINEERING, INC. GAITHERSBURG, MARYLAND - 15-OCT-01 09:30:28 *****
 ***** LAST UPDATE: 011015 *****

RM10223	234 A	FR	POLARIZATION	ERP {KW}	HHAT	RCAMSL
VALLIANT OK	US	ADD		HOR PLN	BM TILT	{METER} [METER]
34.0006	95.0542 {D.MMSS}	94.7 MHz	HORIZONTAL	6.000	0.000	100.0
			VERTICAL	0.000	0.000	0.0

THE FOLLOWING CONTOURS ARE CALCULATED USING:

ERP= 6.000 (KW) 7.8 (DBK) HAAT= 100.0 (METERS)

INTERFERING	DOMESTIC
	DBU KM
CO CHANNEL { 40.0}	86.7
1ST ADJACENT { 54.0}	43.7
2ND ADJACENT { 80.0}	9.1
3RD ADJACENT {100.0}	2.8
PROTECTED { 60.U}	28.3
CITY GRADE { 70.0}	16.2

CALCULATED HAAT FROM TOPO DATA BASE

AZIMUTH	H M T	HAAT	CONTOURS (KM)
DEGREES	{METERS}	{FEET}	70 DBU 60 DBU
0.0	87.9	288.2	15.0 26.6
45.0	99.0	324.8	16.1 28.2
30.0	110.1	361.2	17.1 29.6
135.0	104.9	344.1	16.6 28.9
180.0	118.6	389.2	17.8 30.6
225.0	109.5	359.3	17.0 29.5
270.0	94.6	310.2	15.6 27.6
315.0	75.5	247.7	13.9 24.8
AVERAGE	100.0	328.1	16.2 28.3
EST SITE ELEVATION :	155.1 m.;	508.8 ft.	
EST RAD CENTER AGI. :	81.3 m.;	266.7 ft.	
RAD CENTER A.M.S.L. :	236.4 m.;	775.5 ft.	

DOWNGRADED TO CLASS A ALLOTMENT USING CITY REFERENCE POINT

CHANNEL ALLOCATION - CH. 234A
 (Downgrade)

MM DOC 01-216 - VALLIANT, OK
 COUNTERPROPOSAL - RADIO ONE LICENSES, INC.

MULLANEY ENGINEERING, INC.
 GAITHERSBURG, MARYLAND

FIGURE 3 (page 1 of 2)
 October 2001

DOWNGRADED TO CLASS A ALLOTMENT USING CITY REFERENCE POINT

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*****
AZIMUTH      LAT      LONG      ERP (KW) HAAT D I-CON P-CON      IR      IC REZLT
FROM  TO  CALL  STS    FILE NUMBER  CITY      ST C    (D.MMSS)  REL CHN  HORZ VERT  (M) A F5010 F5050  DIST RSEP RSEP IR
                        (KM) (KM) (KM) (KM) (KM)
340.2 160.0      ADD      RM10211    CLAYTON    OK A 34.3522 95.2109 2ND 232C3      H      V      69.4 42.
143.6 324.2 KRUF  LIC      BLH880314KB SHREVEPOR LA A 32.4013 93.5559 1ST 233C      100B 100B 334      183.0 165.
251.6 73.6  KTXQ-F LIC      BLH001031AC GAINESVIL TX A 33.3337 96.5734 1ST 233C      100H 100V 581      179.5 165.
252.6 71.6  KTXQ-F APP      BPH010830AB GAINESVIL TX A 33.3208 96.4954 1ST 233C      78B 788 5910      169.0 165.
35.8 216.4 KOLX  LIC      BLH930211KE BARLING    AR A 35.1303 94.0108 1ST 233C2      31H 31V 1530      167.1 106.

0.0 0.0      ADD      RM10223    VALLIANT  OK A 34.0006 95.0542 CO 234C3      H      V      0.0 142.

309.7 128.4 KQSR  LIC      BLH000105AA OKLAHOMA  OK A 35.3552 97.2922 CO 234C      94.9H94.9V 3720      281.7 226.
228.5 47.5  KLTY  LIC      BLH910506KF ARLINGTON TX A 32.3522 96.5810 1ST 235C      100B 100B 460      234.5 165.
228.4 47.4 KLTK  CP      BPH010613AC ARLINGTON TX A 32.3519 96.5805 1ST 235C      99H 99V 508      234.5 165.
134.9 315.3 KEWL-F LIC      BLH950714KA NEW BOSTO TX A 33.2615 94.2511 2ND 236C3      25H 25V 99      88.5 42.
130.5 310.8 KEWL-F CP      BPH971104IE NEW BOSTO TX A 33.3042 94.2431 2ND 236C2      22H 22V 1440      83.7 55.

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THERE WERE 0 AM STATIONS WITHIN 6.43 KM (4 MI) OF THE FM REFERENCE COORDINATES

CHANNEL ALLOCATION - CH. 234A
(Downgrade)

MM DOC 01-216 - VALLIANT, OK
COUNTERPROPOSAL - RADIO ONE LICENSES, INC

MULLANEY ENGINEERING, INC.
GAITBERSBURG, MARYLAND


FIGURE 3 (page 2 of 2)
October 2001

CERTIFICATE OF SERVICE

I, Donna Sanchez-Arango, a secretary in the law ~~firm~~ of Davis Wright Tremaine LLP, do hereby certify that I have on this 22nd day of October, 2001, caused to be mailed by first class mail, postage prepaid, copies of the foregoing "Comments and Counterproposal" to the following:

R. Barthen Gorman
Federal Communications Commission
445 12th Street, SW
Room 3-A224
Washington, DC 20554

Maurice Salsa
5616 Evergreen Valley Drive
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